

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NIKE, INC.,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No. 25-cv-01557

Judge Matthew F. Kennelly

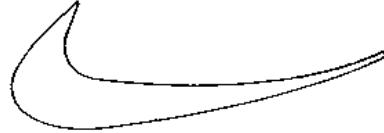
SEALED EX PARTE TEMPORARY RESTRAINING ORDER

THIS CAUSE being before the Court on Plaintiff Nike, Inc.’s (“Plaintiff” or “Nike”) *Ex Parte* Motion for Entry of a Temporary Restraining Order, including a Temporary Injunction, a Temporary Asset Restraint, and Expedited Discovery, and Motion for Electronic Service of Process Pursuant to Fed. R. Civ. P. 4(f)(3) (the “Motions”) against the fully interactive, e-commerce stores¹ operating under the seller aliases identified in Schedule A to the Complaint and attached hereto (the “Seller Aliases”), and this Court having heard the evidence before it hereby GRANTS Plaintiff’s Motions in their entirety.

This Court further finds that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases, offer shipping to the United States, including Illinois, accept payment in U.S. dollars, and/or funds from U.S. bank accounts, and have sold products using infringing and counterfeit

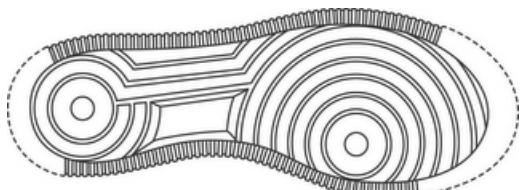
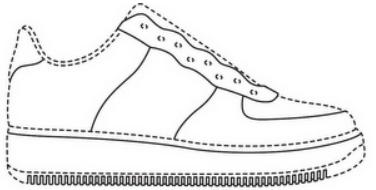
¹ The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces.

versions of the federally registered Nike trademarks (the “Nike Trademarks”) (a list of which is included in the chart below) to residents of Illinois.

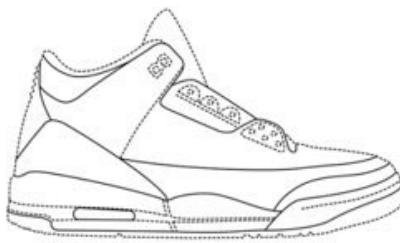
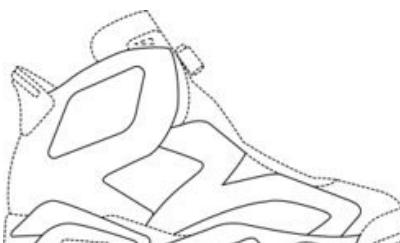
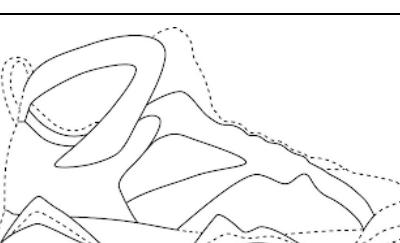
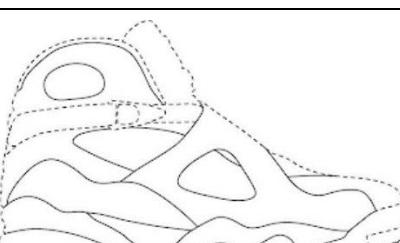
Registration Number	Trademark
978952 1153938 1214930 1945654 1277066 4704670	NIKE (word mark)
1307123	NIKE AIR (word mark)
3192901	NIKE FREE (word mark)
977190 1145473	
1323343 4704672 1284385 1990180	
2068075	
1571066 1284386	

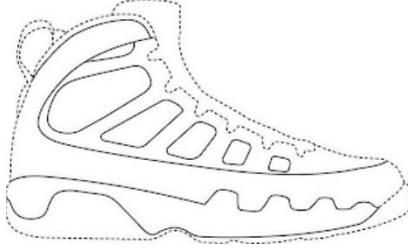
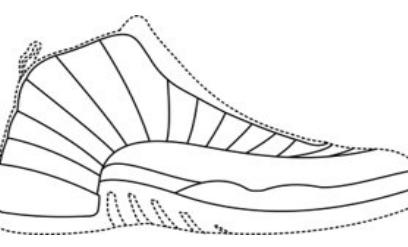
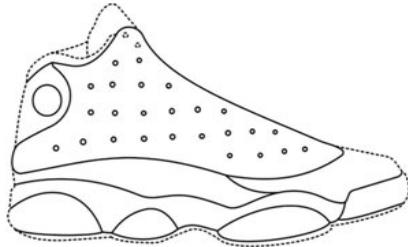
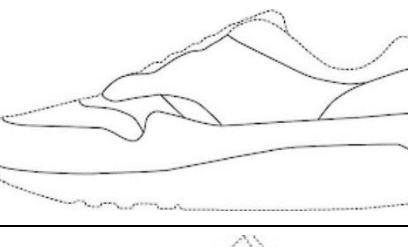
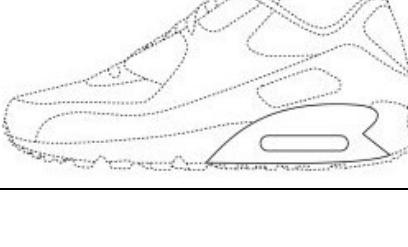
1237469 1325938 1772987	
2104329	
4764071	JUST DO IT (word mark)
1875307	JUST DO IT. (word mark)
1200529 2164810	SWOOSH (word mark)
1508348	AIR MAX (word mark)
5503242	VAPORMAX (word mark)
5286596	NIKE AIR VAPORMAX (word mark)
2716140	PRESTO (word mark)
3370246 3412757	LEBRON (word mark)
1370283	AIR JORDAN (word mark)
1686515	AIR FLIGHT (word mark)
3627820	JUMPMAN (word mark)
4210496	MERCURIAL (word mark)

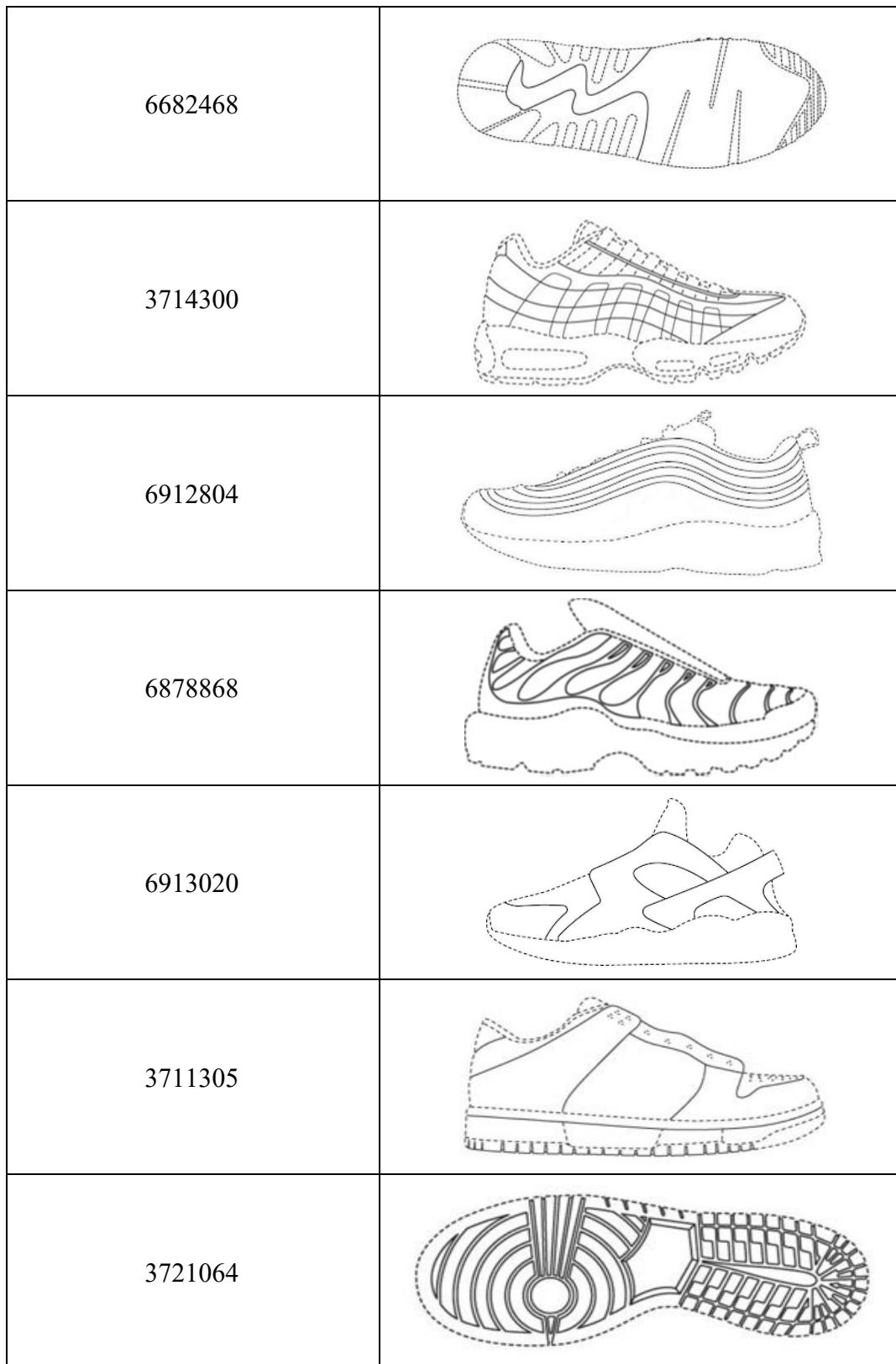
3780236	DUNK (word mark)
3520484	AIR FORCE 1 (word mark)
1027021	CORTEZ (word mark)
1794058 2571314 1887959	DRI-FIT (word mark)
4393310	FLYKNIT (word mark)
5700611	TECHKNIT (word mark)
1839775	THERMA-FIT (word mark)
1558100	
1742019	
3725535	
4254513	

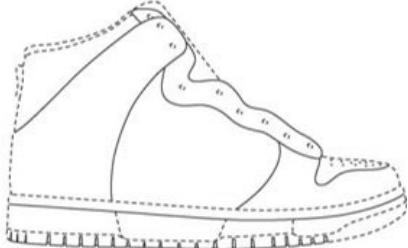
3580156	
4462766	
4137741	
3451904	
3451905	
5820374	
3451906	

3451907	
7470617	
6368691	
6368693	
6368694	
7163957	

6639127	
6639128	
6639129	
6883603	
7283269	
7150835	

7150836	
6639227	
6876338	
6876339	
6913039	
6682467	



3711303	
6639228	
4449186	

This Court also finds that issuing this Order without notice pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure is appropriate because Plaintiff has presented specific facts in the Declaration of Joe Pallett [16], and the Declaration of Justin R. Gaudio [15], in support of the Motion for Temporary Restraining Order and accompanying evidence clearly showing that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition. Specifically, in the absence of an *ex parte* Order, Defendants could and likely would move any assets from accounts in financial institutions under this Court's jurisdiction to off-shore accounts. As other courts have recognized, proceedings against those who deliberately traffic in counterfeit merchandise are often useless if notice is given to the adverse party. Accordingly, this Court orders that:

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be temporarily enjoined and restrained from:
 - a. using the Nike Trademarks or any reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Nike product or not authorized by Plaintiff to be sold in connection with the Nike Trademarks;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Nike product or any other product produced by Plaintiff, that is not Plaintiff's or not produced under the authorization, control or supervision of Plaintiff and approved by Plaintiff for sale under the Nike Trademarks;
 - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
 - d. further infringing the Nike Trademarks and damaging Plaintiff's goodwill; and
 - e. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear any of Plaintiff's trademarks, including the Nike Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof.
2. Upon Plaintiff's request, any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of the Online Marketplaces, including, without limitation, any online marketplace platforms such as eBay, Inc.

(“eBay”), AliExpress, Alibaba Group Holding Ltd., and Alibaba.com Singapore E-Commerce Private Limited (collectively “Alibaba”), Amazon.com, Inc. (“Amazon”), Wish US Holdings LLC (“Wish.com”), Walmart, Inc. (“Walmart”), Etsy, Inc. (“Etsy”), WhaleCo Inc. (“Temu”) ByteDance Ltd., TikTok Ltd., TikTok Inc., and TikTok LLC (collectively “TikTok”), and DHgate.com (“DHgate”) (collectively, the “Third Party Providers”) shall, within seven (7) calendar days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person’s or entity’s possession or control relating to:

- a. the identities and locations of Defendants, their affiliates, officers, agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information and all associated e-mail addresses;
- b. the nature of Defendants’ operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants’ financial accounts, as well as providing a full accounting of Defendants’ sales and listing history related to their respective Online Marketplaces; and
- c. any financial accounts owned or controlled by Defendants, including their affiliates, officers, agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, Inc. (“PayPal”), eBay, Alipay, Alibaba, Ant Financial Services Group (“Ant Financial”), Amazon Pay, Wish.com, Walmart, Etsy, DHgate, Temu, TikTok or other merchant account

providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

3. Upon Plaintiff's request, those with notice of the injunction, including the Third Party Providers as defined in Paragraph 2, shall, within seven (7) calendar days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the Nike Trademarks.
4. Defendants shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
5. Any Third Party Providers, including PayPal, eBay, Alipay, Alibaba, Ant Financial, Wish.com, Walmart, Etsy, DHgate, Temu, TikTok, and Amazon Pay, shall, within seven (7) calendar days of receipt of this Order:
 - a. locate all accounts and funds connected to Defendants and the Seller Aliases Online Marketplaces, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the e-mail addresses identified in Exhibits to the Declaration of Joe Pallett, and any e-mail addresses provided for Defendants by third parties; and
 - b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
6. Plaintiff is authorized to issue expedited written discovery, pursuant to Federal Rules of Civil Procedure 33, 34 and 36, related to:
 - a. the identities and locations of Defendants, their affiliates, officers, agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation

with them, including all known contact information, including any and all associated e-mail addresses; and

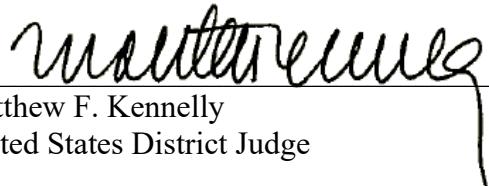
b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces.

Plaintiff is authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

7. Plaintiff may provide notice of these proceedings to Defendants, including notice of the preliminary injunction hearing, service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Complaint, this Order and other relevant documents on a website and by sending an e-mail with a link to said website to an e-mail address for each Defendant. The Clerk of the Court is directed to issue a single original summons in the name of "The Partnerships and all other Defendants identified in the Complaint" that shall apply to all Defendants. The combination of providing notice via electronic publication and e-mail, along with any notice that Defendants receive from payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.

8. Schedule A to the Complaint [2], Seller Aliases screenshots attached to the Declaration of Joe Pallett [17], and this Order shall remain sealed until further ordered by this Court.

9. Plaintiff shall deposit with the Court ten thousand dollars (\$10,000), either cash or surety bond, as security, which amount was determined adequate for the payment of such damages as any person may be entitled to recover as a result of a wrongful restraint hereunder.
10. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and Northern District of Illinois Local Rules.
11. This Temporary Restraining Order without notice is entered at 9:30 A.M. on this 18th day of February, 2025 and shall remain in effect for fourteen (14) days.



Matthew F. Kennelly
United States District Judge

Nike, Inc. v. The Partnerships and Unincorporated Associations Identified on Schedule "A" - Case No. 25-cv-01557

Schedule A

Defendant Online Marketplaces		
No	URL	Name / Seller Alias
1	mingyuecleats.en.alibaba.com	Guangzhou Mingyue Technology Ltd.
2	qzxcdh.en.alibaba.com	Quanzhou Xingcheng Dahai Sports Goods Co., Ltd.
3	zhiboec.en.alibaba.com	Taizhou Zhibo E-Commerce Co., Ltd.
4	kaisuntd.en.alibaba.com	Xiamen Kaisun Trading Co., Ltd.
5	amazon.com/sp?seller=A3BS53UDN4IE9P	fvfbfg
6	amazon.com/sp?seller=A3QK4KT2UV0D7R	hangzhousongyamaoyiyouxiangongsi
7	amazon.com/sp?seller=A2SFL0ZQ3L7VX1	hebeiaojianwenhuachuanboyouxiangongsi
8	amazon.com/sp?seller=A4OR212Y143I0	henanhongxiangjixieshebeiyouxiangongsi
9	amazon.com/sp?seller=A10GPWAZ2YO3EJ	lixiaoming1122
10	amazon.com/sp?seller=A1853WC2507Q48	MALELEGUANLING
11	amazon.com/sp?seller=AZNCY7JDV3WM8	Sufeasdf Shop
12	amazon.com/sp?seller=ALQ42DM46M0XP	Sufeasdf US
13	amazon.com/sp?seller=A23L3K7P098QLE	taianshichuanjiahengyedianzishangwufuwuyouxiangongsi
14	amazon.com/sp?seller=AFL6WOR1V1UG7	WWWGC
15	amazon.com/sp?seller=A2P4ZZQLNUUUSM	yanbianfang1122
16	amazon.com/sp?seller=A17J807F0R8Z22	zunyijinglushangmaoyouxiangongsi
17	ebay.com/usr/tty56884	tty56884
18	ebay.com/usr/uhuangrenma	uhuangrenma
19	ebay.com/usr/uthfrjkdhgkjkh	uthfrjkdhgkjkh
20	ebay.com/usr/vcxb1775	vcxb1775
21	ebay.com/usr/vhjgdjfjyk	vhjgdjfjyk
22	ebay.com/usr/wangjinlong6196	wangjinlong6196
23	ebay.com/usr/wangxianchao_0	wangxianchao_0
24	ebay.com/usr/wangzihui_8	wangzihui_8
25	ebay.com/usr/wdvhdxsa	wdvhdxsa
26	ebay.com/usr/weixiaoling_0	weixiaoling_0
27	ebay.com/usr/wudongyue1111	wudongyue1111
28	ebay.com/usr/xianbotailongma-0	xianbotailongma-0
29	ebay.com/usr/xiangfeiz0806	xiangfeiz0806
30	ebay.com/usr/xiangxianglaifeishangmaoyouxiangongsi	xiangxianglaifeishangmaoyouxiangongsi
31	ebay.com/usr/xiaodan595878	xiaodan595878

32	ebay.com/usr/xupanyuan_1	xupanyuan_1
33	ebay.com/usr/yangyun-6	yangyun-6
34	ebay.com/usr/yaoyuandejuli	yaoyuandejuli
35	ebay.com/usr/yiwushiyajindianzishangwuyou xiangongsi	yiwushiyajindianzishangwuyouxiangongsi
36	ebay.com/usr/yiwushiyubanmao_0	yiwushiyubanmao_0
37	ebay.com/usr/yoursstore2000	yoursstore2000
38	ebay.com/usr/yuhuqiang	yuhuqiang
39	ebay.com/usr/yunchengshiyianhuquyuyika-0	yunchengshiyianhuquyuyika-0
40	ebay.com/usr/yydsports88	yydsports88
41	ebay.com/usr/ze2-1566	ze2-1566
42	ebay.com/usr/zhangbaoqun	zhangbaoqun
43	ebay.com/usr/zhangtianyu2	zhangtianyu2
44	ebay.com/usr/zhangwenlong5	zhangwenlong5
45	ebay.com/usr/zhangyangyan	zhangyangyan
46	ebay.com/usr/zhengoffice	zhengoffice
47	ebay.com/usr/zhonghailin1	zhonghailin1
48	ebay.com/usr/zhonghuazeng_3	zhonghuazeng_3
49	ebay.com/usr/zhouzhenbao	zhouzhenbao
50	ebay.com/usr/zhuguohao	zhuguohao
51	ebay.com/usr/zlikjsljfioehj	zlikjsljfioehj
52	instagram.com/auxkkk_/?hl=en	auxkkk_
53	instagram.com/dk_doris/?hl=en	dk_doris
54	instagram.com/grindtruth/	grindtruth
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56	instagram.com/wa.me888/?hl=en	wa.me888
57	instagram.com/xiaowen_h12/?hl=en	xiaowen_h12
58	instagram.com/zhiwen1710/?hl=en	zhiwen1710
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60	temu.com/m-634418219433406.html	Cc mens wardrobe
61	temu.com/m-634418219044024.html	justin case
62	temu.com/m-634418218503918.html	Sisimi
63	tiktok.com/@glc801	glc801
64	tiktok.com/@jc_sports07?lang=en	jc_sports07
65	tiktok.com/@small_steps1	small_steps1
66	walmart.com/seller/102600647	Enoluxesa Technology Co., Ltd
67	walmart.com/seller/102628899	fkhahdoiajf
68	walmart.com/seller/102501121	guoshiyan
69	walmart.com/seller/101687339	jinanhuaqulixinnengyuan
70	walmart.com/seller/102572293	ninglaishangmao
71	walmart.com/seller/101597313	Zenoluxe Technology Co., Ltd
72	walmart.com/seller/102496387	zhushengjie
73	futbalfanatico.com	futbalfanatico.com

74	jjsneakers11.com	jjsneakers11.com
75	jtkick.xyz	jtkick.xyz
76	jussangelboutique.com	jussangelboutique.com
77	kickzfluence.com	kickzfluence.com
78	lingakick.com	lingakick.com
79	lingakicks.com	lingakicks.com
80	nicekicksshop.org	nicekicksshop.org
81	pelopel.com	pelopel.com
82	sneakers8shop.com	sneakers8shop.com
83	sneakertax.com	sneakertax.com
84	youtube.com/@runfast-sneakers/shorts	runfast-sneakers
85	youtube.com/@shoes_china54	shoes_china54
86	youtube.com/@YtShakti-ul5id	YtShakti-ul5id